

Approved:



JEFFREY W. COYLE
Assistant United States Attorney

Before:

THE HONORABLE JAMES L. COTT
Chief United States Magistrate Judge
Southern District of New York

23 MAG 4001

UNITED STATES OF AMERICA

v.

IGGAL COPELAND,

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 1951,
924(c)(1)(A)(i) and (ii), and 2.

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

STEVEN SAINT HILAIRE, being duly sworn, deposes and says that he is a Detective with the New York City Police Department (the "NYPD") and a Task Force Officer with the ATF/NYPD Joint Robbery Task Force ("SPARTA"), and charges as follows:

COUNT ONE

(Conspiracy to Commit Hobbs Act Robbery)

1. On or about April 21, 2023, in the Southern District of New York and elsewhere, IGGAL COPELAND, the defendant, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, COPELAND conspired with others to rob at gunpoint an electronics store in Manhattan, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO

(Hobbs Act Robbery)

2. On or about April 21, 2023, in the Southern District of New York and elsewhere, IGGAL COPELAND, the defendant, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is

defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, COPELAND robbed at gunpoint an electronics store in Manhattan, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE
(Firearms Use, Carrying, and Possession)

3. On or about April 21, 2023, in the Southern District of New York and elsewhere, IGGAL COPELAND, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Two of this Complaint, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and (ii), and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

4. I am a Detective with the NYPD and a Task Force Officer with SPARTA, and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my conversations with law enforcement agents and others and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

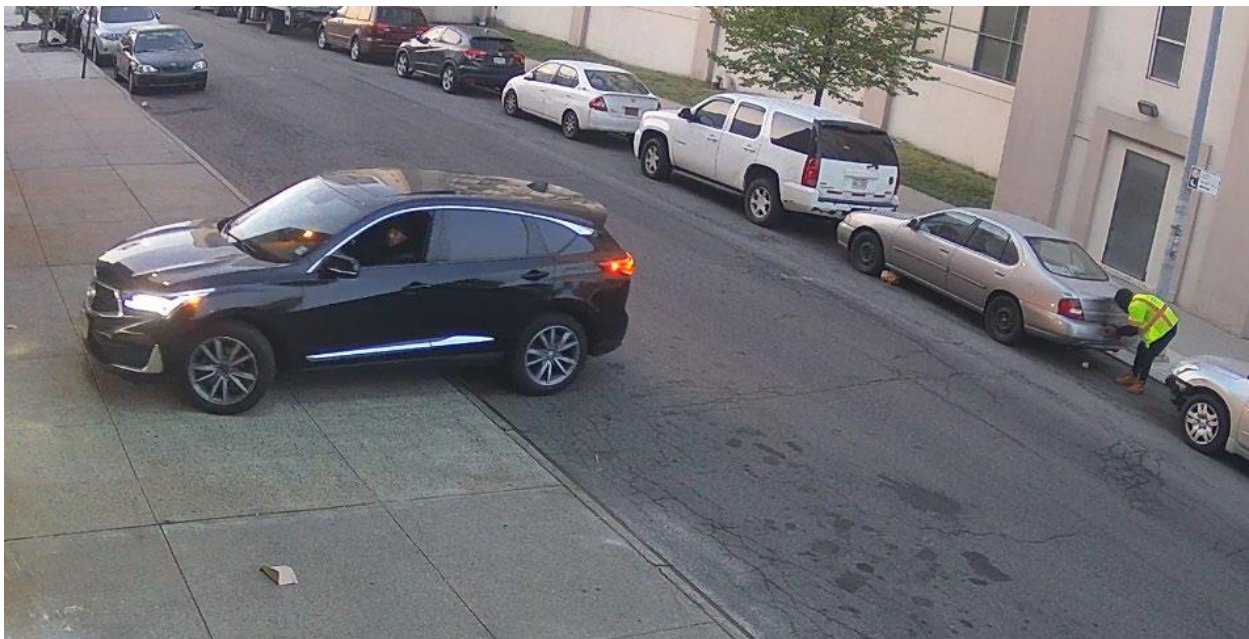
Overview

5. As explained below, the investigation to date has revealed that on or about April 21, 2023, IGGAL COPELAND, the defendant, and another individual (“CC-1”) robbed at gunpoint (the “Robbery”) an electronics store in Manhattan, New York (the “Store”). COPELAND and CC-1 disguised themselves as employees of a common carrier (“Carrier-1”) to gain access to the Store as a 74-year-old store employee (“Victim-1”) was opening the Store for business in the morning. COPELAND and CC-1 forced Victim-1 to a back room and attempted to gain access to a safe while holding a handgun to Victim-1’s head. CC-1 hit Victim-1 in the head with the handgun and COPELAND threatened that unless Victim-1 opened the safe, they would harm the granddaughter of Victim-1. COPELAND and CC-1 fled the Store after taking approximately \$1,500.

COPELAND and CC-1 Used a Drop Vehicle with a Stolen
License Plate to Drive to the Robbery

6. Based on my involvement in this investigation, my review of surveillance camera footage, my review of law enforcement reports, and my discussions with law enforcement officers, I know that:

a. On or about April 21, 2023, at approximately 6:00 a.m.—approximately 90 minutes before the Robbery—a male individual, who was subsequently identified as IGGAL COPELAND, the defendant, see ¶¶ 10-16, *infra*, parked a black Acura RDX (the “Acura”) on the street near or around 145 51st Street, Brooklyn, New York (the “Brooklyn Location”). A male individual matching the appearance of CC-1, including the same physical build and distinct footwear worn by CC-1 during the Robbery, walked up the street and put a license plate (the “License Plate”) on a silver Nissan Altima with a distinctive dent (the “Altima”), which was parked on the street. COPELAND and CC-1 then entered the Altima and drove away, while leaving the Acura parked on the street. The still image from surveillance footage below shows CC-1 putting the License Plate on the Altima, while COPELAND drives the Acura.



b. Surveillance footage taken at 11 Greene Street, Manhattan, New York, 10013, approximately one block away from the Store, shows that on or about April 21, 2023, at approximately 7:30 a.m., COPELAND and CC-1 exited the Altima and walked to the Store as Victim-1 was opening the Store. The distinctive dent in the Altima is visible in the photograph described in Paragraph 6.c. The still image from surveillance footage below shows COPELAND and CC-1 shortly after exiting the Altima, which is the vehicle closest to the camera parked on the side of the street. The time stamp on the image is approximately one hour behind the actual time.



c. An individual (“Individual-1”) took a photograph of the Altima shortly after COPELAND and CC-1 exited it, which is shown below. Based on my discussions with other law enforcement officers, I know that the license plate depicted in the photograph (the “License Plate”) is not registered to the Altima, but is in fact registered to a different vehicle. On or about April 24, 2023, an individual (“Individual-2”) reported to law enforcement that the License Plate had been stolen from Individual-2’s vehicle.



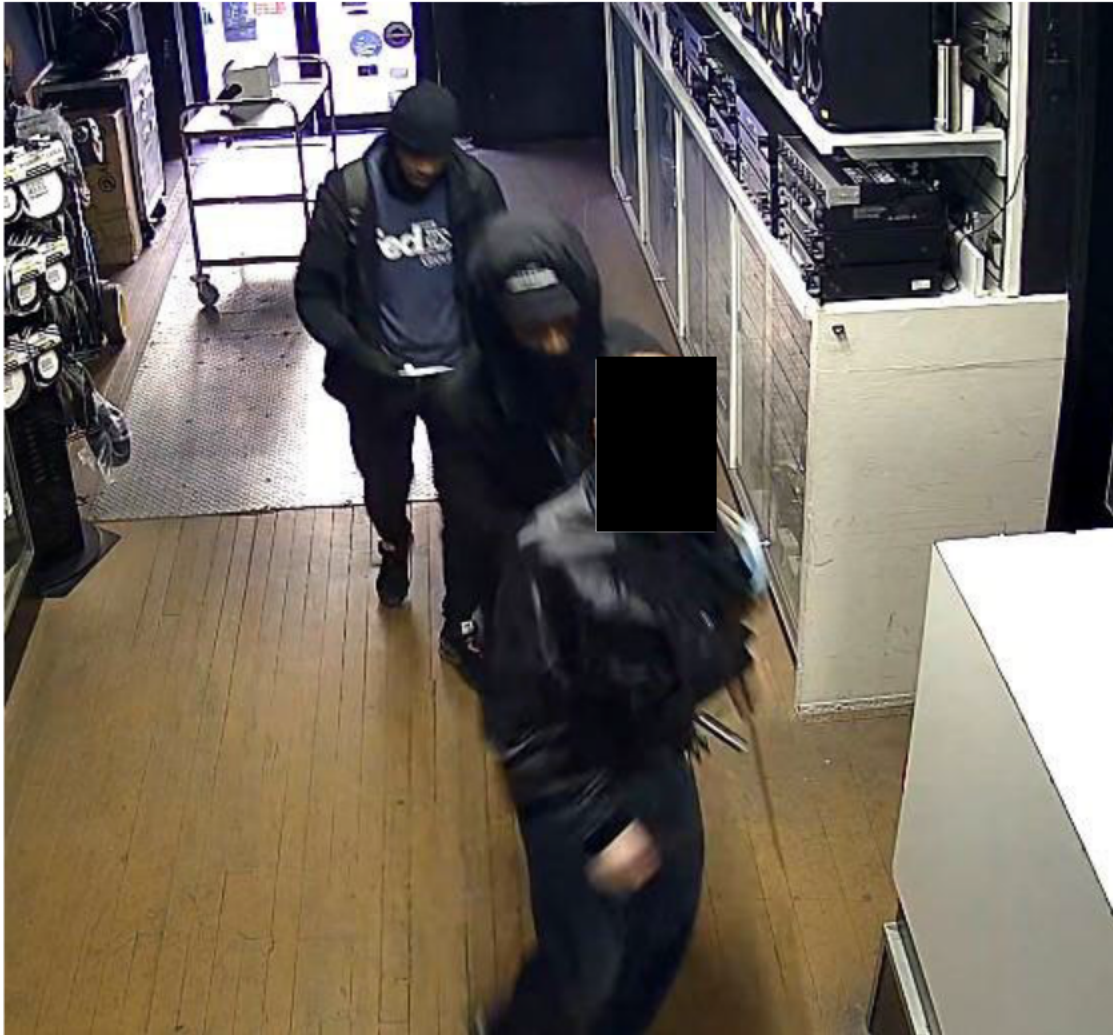
COPELAND and CC-1 Robbed the Store at Gunpoint While Disguised as Carrier-1 Workers

7. Based on my involvement in this investigation, my review of surveillance camera footage, my review of law enforcement reports, and my discussions with law enforcement officers, I know that:

a. IGGAL COPELAND, the defendant, wearing a black hat, a Carrier-1 shirt, and a black backpack, and CC-1 approached Victim-1 outside of the Store and told Victim-1 that they were Carrier-1 employees attempting to make a delivery. COPELAND and CC-1 then forced their way into the Store. The still image from surveillance footage below shows COPELAND (with a red circle) and CC-1 speaking with Victim-1 before forcing their way into the Store.



b. After COPELAND and CC-1 forced their way into the Store, CC-1 threw Victim-1 to the ground, brandished a handgun, pointed it at Victim-1, and pushed Victim-1 to the back of the Store toward a room containing a safe. COPELAND locked the front door to the Store from which he and CC-1 entered and ran back to the room containing the safe. The still image from surveillance footage below shows COPELAND and CC-1 forcing Victim-1 to the back of the Store where the safe was located.



c. During the encounter, which was audio- and video-recorded by the Store's surveillance cameras, CC-1 held a handgun to the head of Victim-1 and demanded that Victim-1 open the safe. COPELAND said to Victim-1, "Stop Yelling" and "Open the door [to the safe] . . . do you want your granddaughter [to overhear] when she comes down for school." CC-1 hit Victim-1 in the back of the head with the handgun and COPELAND said "I'm about to kill his grandbaby . . . he's fuckin' playing games." The still image from surveillance footage below shows CC-1 holding a handgun to the head of Victim-1 while he and COPELAND tried to get Victim-1 to open the safe.



d. After attempting unsuccessfully to gain access to the safe, COPELAND and CC-1 took approximately \$1,500 from Victim-1 that were proceeds from the Store, ran to the front of the Store, and CC-1 pushed a 73-year-old female employee of the Store (“Victim-2”) to the ground. CC-1 then dragged Victim-2 across the floor and away from the exit of the Store.

e. Two individuals outside of the Store heard screams coming from Victim-2 inside the Store, intervened to stop the Robbery, and attempted to stop COPELAND and CC-1 from fleeing from the store. The images from surveillance camera footage below show the two individuals confronting COPELAND outside of the Store.

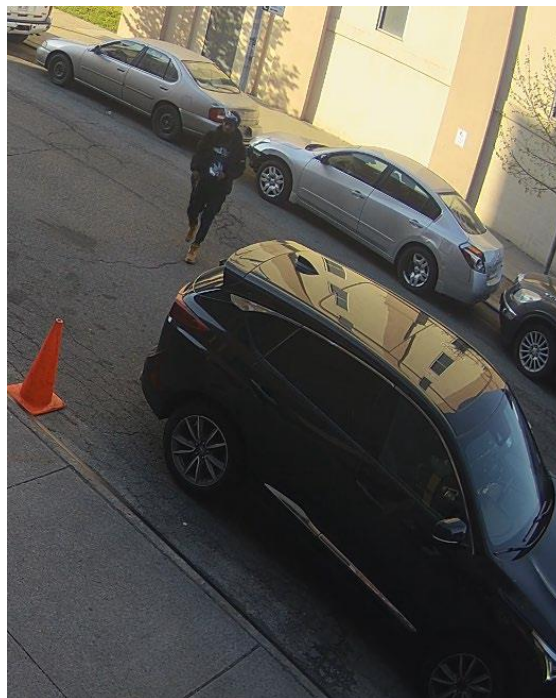
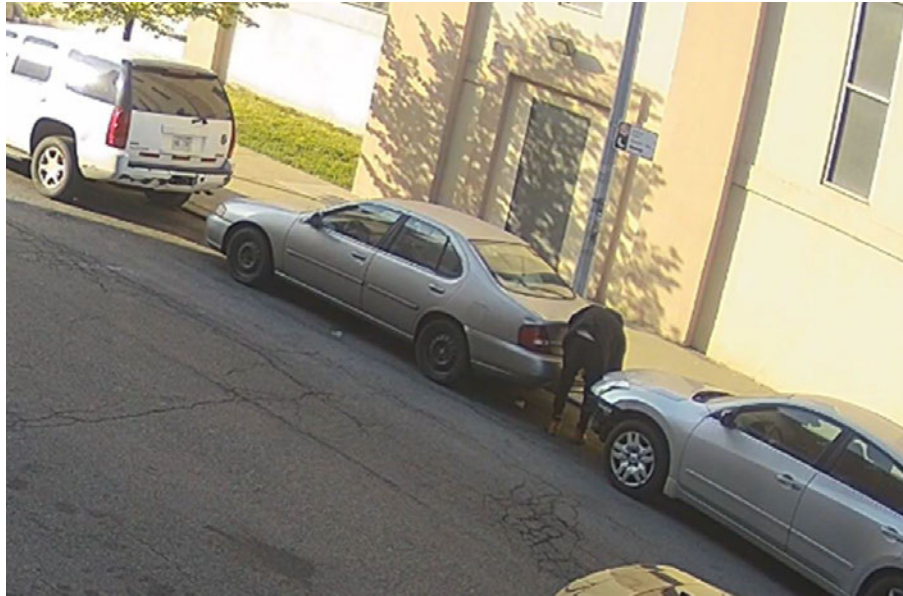


COPELAND Escaped in the Altima and Returned to the Brooklyn Location with CC-1

8. On or about April 21, 2023, at approximately 7:37 a.m.—which was shortly after the Robbery, surveillance camera footage showed IGGAL COPELAND, the defendant, run back to the Altima and drive away quickly.

9. On or about April 21, 2023, at approximately 7:44 a.m., LPR data showed the Altima traveling over the Manhattan Bridge inbound to Brooklyn.

10. Based on my review of surveillance camera footage, I know that on or about April 21, 2023 at approximately 7:58 a.m.—which was approximately 30 minutes after the Robbery—IGGAL COPELAND, the defendant, and CC-1 returned in the Altima to the Brooklyn Location. CC-1 then removed the License Plate from the Altima, entered the passenger side of the Acura, and COPELAND and CC-1 drove away in the Acura, while the Altima was left on the side of the street. The images below show CC-1 taking the License Plate off of the Altima after the Robbery and walking back to the Acura.



Identification of IGGAL COPELAND

11. Based on my review of records from the New York State Department of Motor Vehicles, I know that the Acura is registered to a female individual (the “Female”).

12. Based on my review of law enforcement records, I know that IGGAL COPELAND, the defendant, has been serving a term of supervised release based on a federal felony conviction. Based on information provided to law enforcement officers from the United States Probation Officer (the “Probation Officer”) supervising COPELAND, I know that on or

about March 2, 2023, COPELAND reported to the Probation Officer that he lives with the Female at an address located in New Jersey (the “New Jersey Address”).

13. Based on my review of a public ecommerce website, I know that individuals with names matching the Female and IGGAL COPELAND, the defendant, were listed on a baby registry for a child with a delivery date of January 8, 2023.

14. Based on my involvement in this investigation, my review of law enforcement reports and my discussions with law enforcement officers, I know that on or about May 2, 2023, the Probation Officer told law enforcement officers that IGGAL COPELAND, the defendant, provided a certain phone number (the “Copeland Cellphone”) as his phone number to the Probation Officer, and that COPELAND called the Probation Officer from that number as recently as May 2, 2023.

15. Based on my review of records from the cellphone service provider for the Copeland Cellphone (“Provider-1”), including subscriber information, toll records, and geolocation data, I have learned the following:

a. A certain phone number (the “Female Cellphone”) is subscribed to the Female using the New Jersey Address.

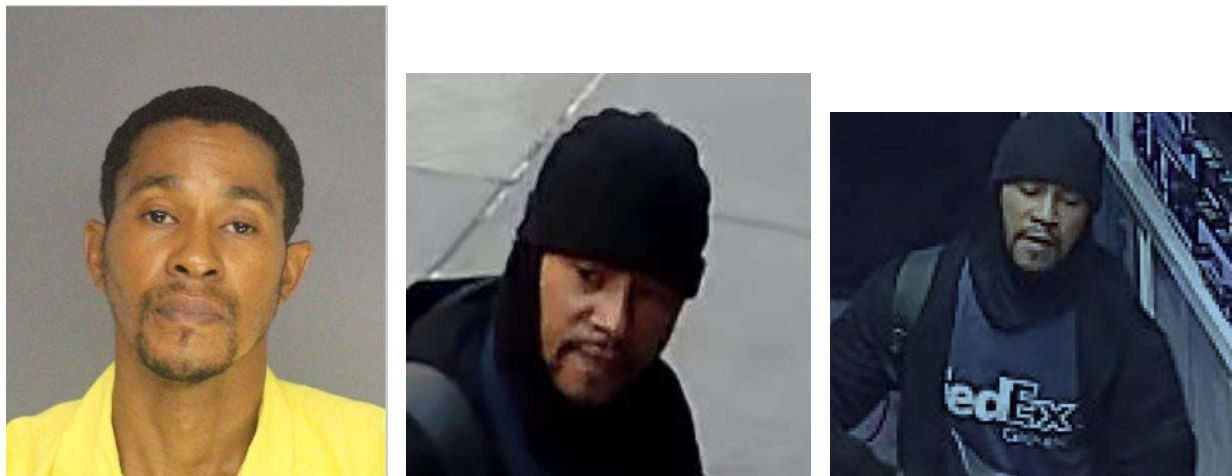
b. The Female Cellphone has made contact with the Copeland Cellphone approximately 249 times between March 31, 2023 and April 28, 2023.

c. The Copeland Cellphone was located in the vicinity of the Store on April 21, 2023 at approximately 6:57 a.m.

d. The Copeland Cellphone was located in the vicinity of the Brooklyn Location on April 21, 2023 at approximately 5:48 a.m. and 8:03 a.m.

e. Since on or about May 6, 2023, the Copeland Cellphone has consistently been located in the vicinity of the New Jersey Address in the morning hours.

16. Based on my review of a law enforcement photograph of IGGAL COPELAND, the defendant, taken on June 8, 2021 (which is shown on the left side below) and still images from surveillance footage of COPELAND during the Robbery (which are the middle and right photographs shown below), I believe that the person in the middle and right photographs below is COPELAND.



WHEREFORE the deponent requests that a warrant be issued for the arrest of IGGAL COPELAND, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s/ Steven Saint Hilaire, by the Court, with permission

STEVEN SAINT HILAIRE

Task Force Officer

ATF/NYPD Joint Robbery Task Force

Sworn to before me by
reliable electronic means this
16th day of May, 2023

Handwritten signature of James L. Cott.

JAMES L. COTT

United States Magistrate Judge